

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - CINCINNATI

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY JOHNSON,

Defendant.

CASE NO. 1:23cr49

JUDGE McFarland

INDICTMENT

18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

(Distributing Child Pornography)

On or about February 13, 2022, in the Southern District of Ohio and elsewhere, the defendant, **JEFFREY JOHNSON**, did knowingly distribute any child pornography, as defined in Title 18 United States Code Section 2256(8), to wit: video files using BitTorrent; using any means and facility of interstate and foreign commerce and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18 United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT 2

(Distributing Child Pornography)

On or about September 17, 2022, in the Southern District of Ohio and elsewhere, the defendant, **JEFFREY JOHNSON**, did knowingly distribute any child pornography, as defined in Title 18 United States Code Section 2256(8), to wit: video files using BitTorrent; using any means and facility of interstate and foreign commerce and that has been shipped and transported in and

affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18 United States Code, Sections 2252A(a)(2)(A) and (b)(1).

COUNT 3
(Possession of Child Pornography)

On or about November 29, 2022, in the Southern District of Ohio, the defendant, **JEFFREY JOHNSON**, did knowingly possess a computer disk, and other material, to wit: iPhone 12, a Lenovo laptop, 3 USB drives, 3 Micro SD cards, an external hard drive, a Seagate Disk Drive, and a HP laptop, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18 United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses set forth in Counts 1 through 3 of this Indictment, the defendant, **JEFFREY JOHNSON**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18, United States Code, Chapter 110, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (3) any property, real or personal, used or intended to be used

to commit or to promote the commission of such offense(s) or any property traceable to such property, including but not limited to:

- Laptop - HP Elite Book, silver in color;
- Hard Drive - Seagate Momentus 4200.2 Disk Drive, Model: ST9808210A, Serial Number: 3LF38WFR, with adapter and cable;
- External Hard Drive - EMTEC X200 1 TB, Serial Number: 511210414071A000045, with cable;
- Three (3) Micro SD Cards: Kingston 32 GB, black in color; Netac 8 GB, black and blue in color; and SanDisk 64 GB, red and gold in color;
- Three (3) USB Drives: Microcenter 128 GB, yellow in color; HP 4 GB, black in color; and Cruzer 16 GB, gray in color;
- Laptop - Lenovo, Model: Ideapad 3 15ALC6, Serial Number: PF2WND41, with charger; and
- Cell Phone - iPhone 12, Model: MGFD3LL/A, Serial Number: DNQDK79P0DY0, in black case.

A TRUE BILL



GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**



**KYLE J. HEALEY
ASSISTANT UNITED STATES ATTORNEY**

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